Message

From: Hence, Kia [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E8AAD5EC94F348AB9BA488B06BB98968-HENCE, KIA]
Sent: 1/26/2017 5:57:02 PM
To: Gibson, Benjamin [gibson.benjamin@epa.gov]
CC: Palma, Elizabeth [Palma.Elizabeth@epa.gov]
Subject: RE: 2016 PADEP Exceptional Event Analysis Plan

Either week is good for me.

From: Gibson, Benjamin
Sent: Thursday, January 26, 2017 12:20 PM
To: Hence, Kia <hence.kia@epa.gov>
Cc: Palma, Elizabeth <Palma.Elizabeth@epa.gov>
Subject: RE: 2016 PADEP Exceptional Event Analysis Plan

Kia,

Thanks for the PA and MD updates. I'll try to set up another call soon for EE folks in regions 1, 2, and 3 to discuss speciation availability and other issues related to McMurray.

Do you have a strong preference for next week versus the week after next?

Ben

From: Hence, Kia
Sent: Thursday, January 26, 2017 8:34 AM
To: Gibson, Benjamin <gibson.benjamin@epa.gov>
Subject: RE: 2016 PADEP Exceptional Event Analysis Plan

Hi Ben,
PADEP has been in contact with CT and the discussions have been beneficial. I'm not sure if CT & PA are planning to collaborate on a EE package.
The **biggest** concern is obtaining the speciation data from AQS within a *reasonable* timeframe.
Yes, I believe a multi-region coordination/discussion would be helpful... I'm curious to know how the other S/Ls and the regions are going to deal with the speciation issue.

Thanks for your help and sharing PADEP's message with those working on EE's.

From: Gibson, Benjamin
Sent: Wednesday, January 25, 2017 4:34 PM
To: Hence, Kia <hence.kia@epa.gov>
Subject: RE: 2016 PADEP Exceptional Event Analysis Plan

Very helpful, thank you!

Do you get the sense PA is coordinating with other states (e.g., CT or NJ), or are they essentially doing this on their own? Do you think additional multi-region coordination/discussion specifically on McMurray would be helpful for you all at this point?

If you don't mind, I'll share PA's note with the other folks here working on EE as an FYI.

Thanks again,
Ben

From: Hence, Kia
Sent: Wednesday, January 25, 2017 4:28 PM
To: Gibson, Benjamin <gibson.benjamin@epa.gov>
Subject: FW: 2016 PADEP Exceptional Event Analysis Plan

Hi Ben,

Here's the latest from Pennsylvania. So far, they are the only agency that has plans to pursue data exclusion for the fire.

From: Nolan, Sean [mailto:senolan@pa.gov]
Sent: Thursday, January 19, 2017 3:57 PM
To: Hence, Kia <hence.kia@epa.gov>
Cc: Ramamurthy, Krishnan <kramamurth@pa.gov>; kdalal@pa.gov; Lazor, Nicholas <nlazor@pa.gov>; Chow, Alice <chow.alice@epa.gov>; Hyden, Loretta <Hyden.Loretta@epa.gov>; Rehn, Brian <rehn.brian@epa.gov>; Pino, Maria <Pino.Maria@epa.gov>; powers, marilyn <powers.marilyn@epa.gov>
Subject: 2016 PADEP Exceptional Event Analysis Plan

Kia,

As I discussed by phone a few weeks ago, I am providing you with a description of what we are proposing with respect to flagging data for exceptional events in 2016.

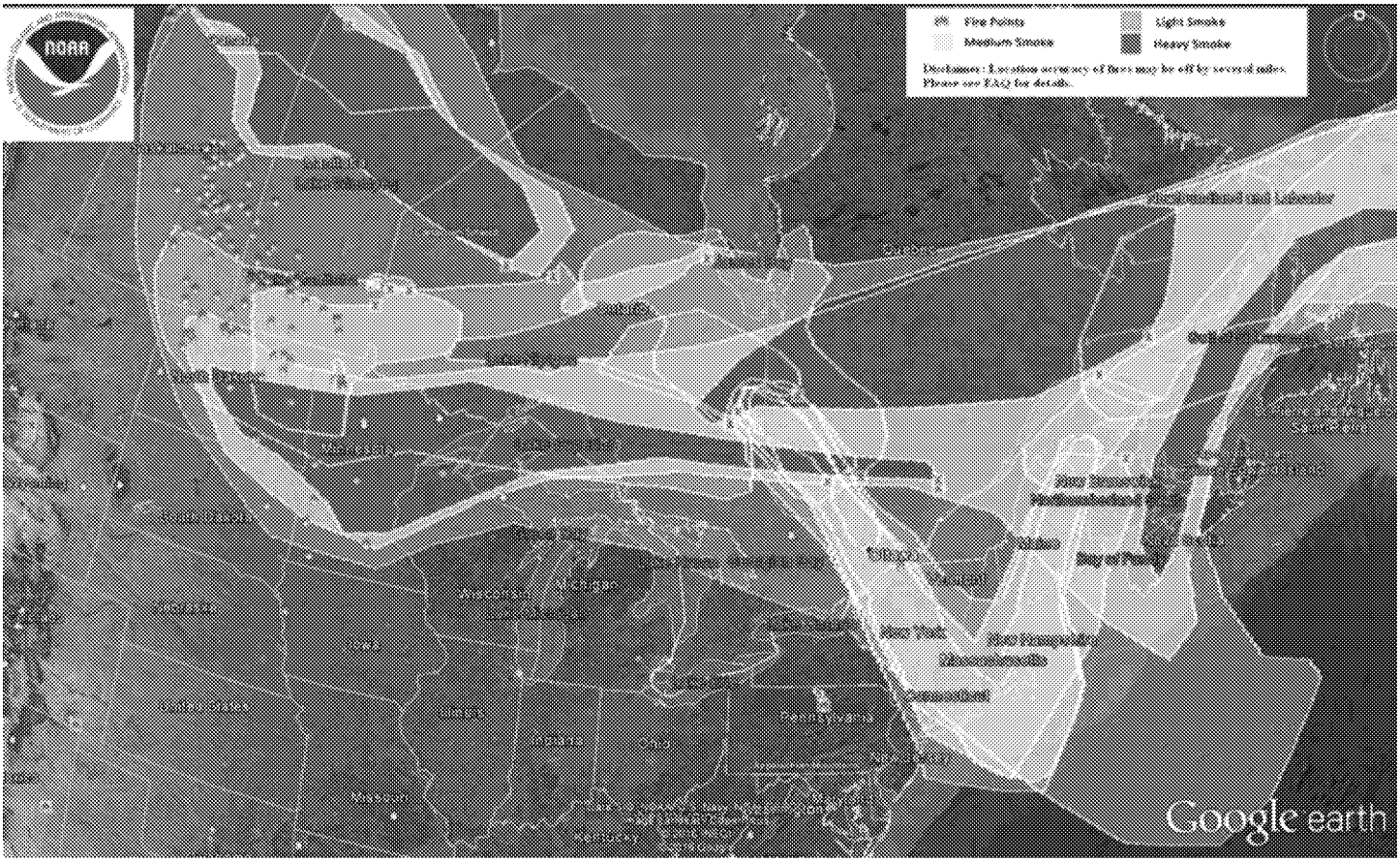
Overall, there are two time frames of interest. Those two time periods are as follows:

1.) May 25-26, 2016
2.) July 21-22, 2016

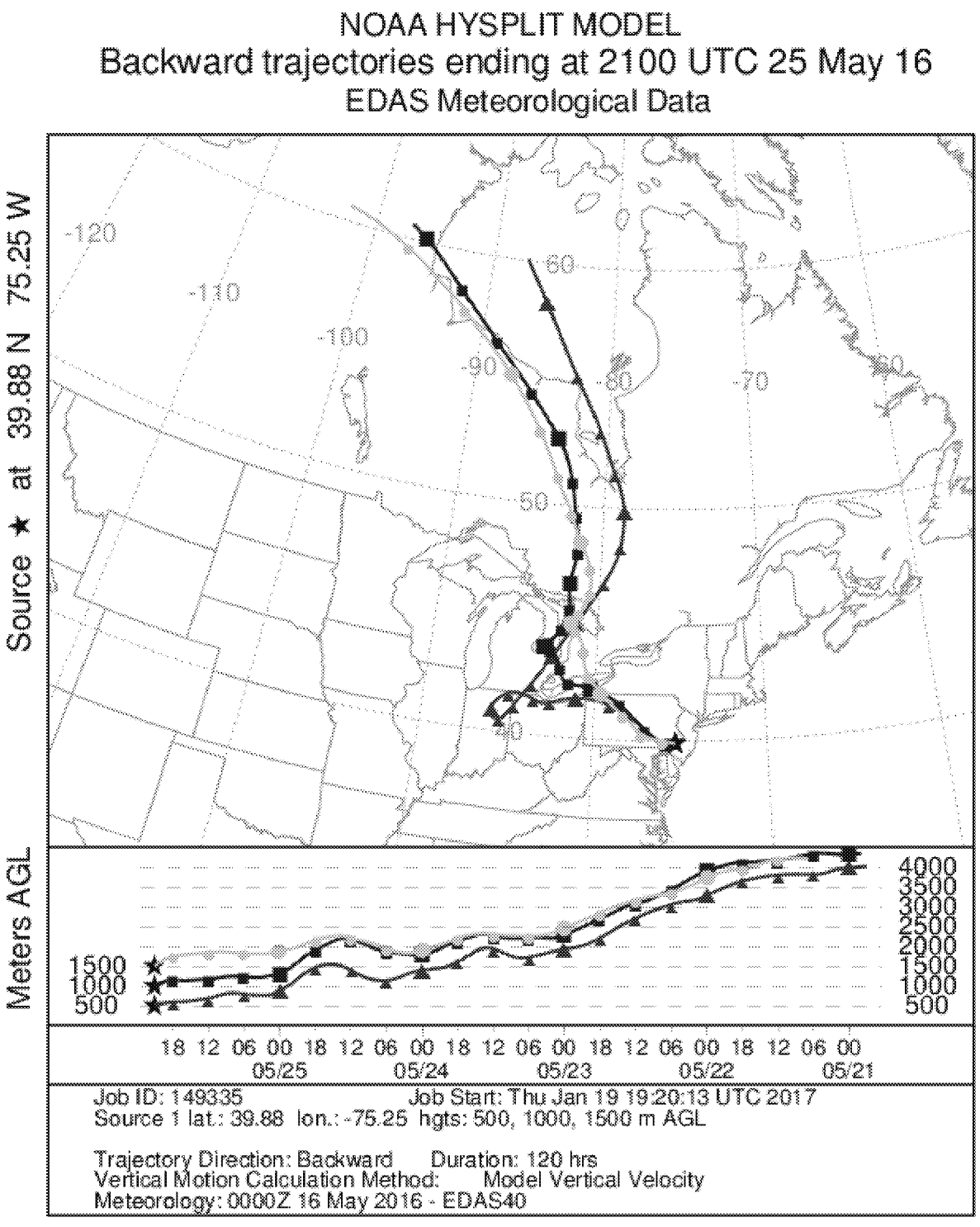
Preliminary analysis of both events indicate that ozone exceedances across the Commonwealth were influenced by wildfire smoke originating from western / central Canada. After doing a cursory review of historical ozone concentrations during these two periods, analyzing meteorological conditions during the two periods and determining what impact these events have had on attaining the 2008 and 2015 ozone standard in the Commonwealth, I believe the results of this analysis would be a worthwhile endeavor.

I wanted to touch briefly on why we think wildfire smoke is a contributor to the ozone exceedances we saw during two periods we have above. Each brief write-up will show that fires were persistent across Canada days before the event impacted the Commonwealth and that the meteorological conditions were conducive to transport of ozone precursors from the wildfires.

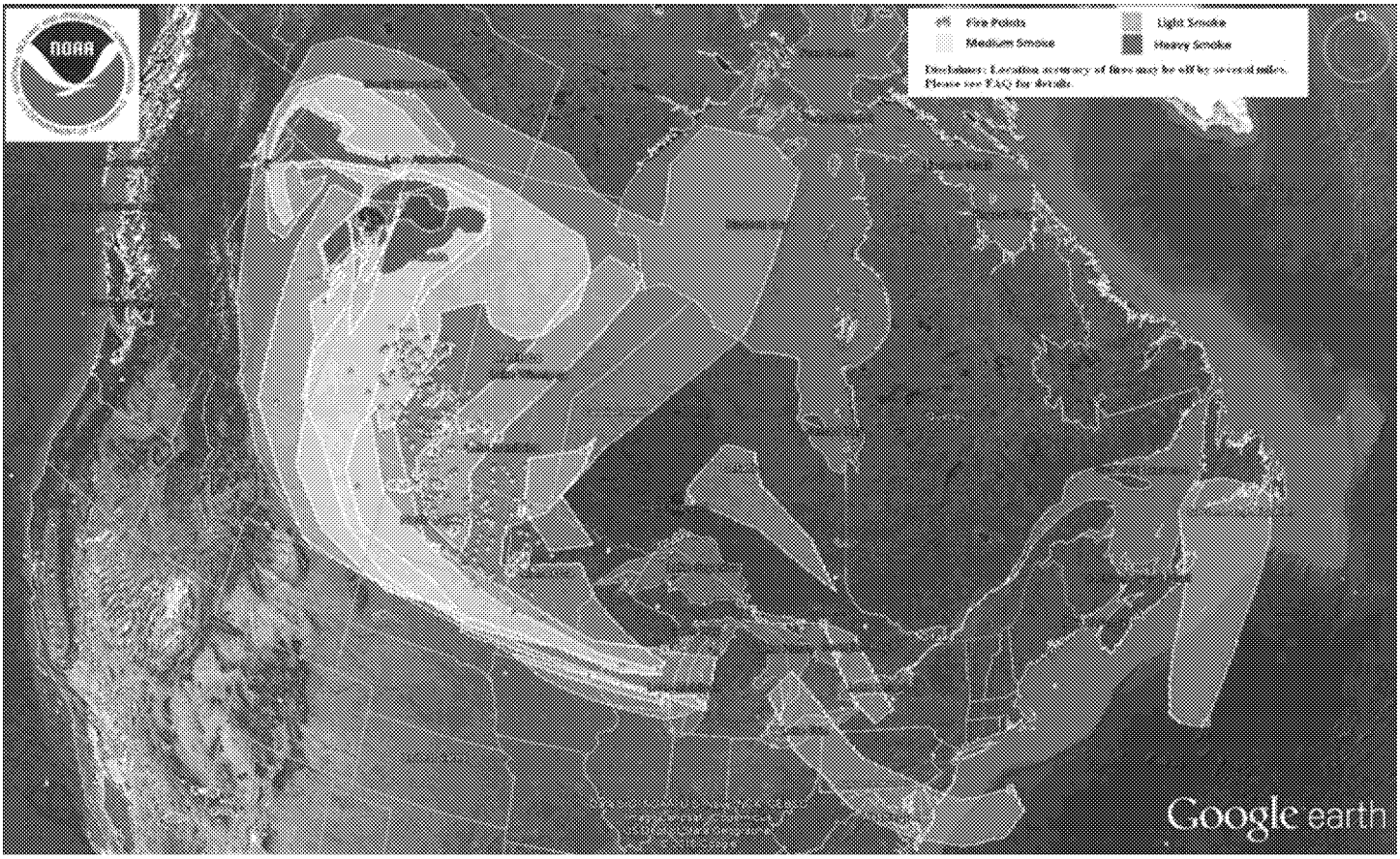
May 25, 2016 – The NOAA fire and smoke detection map below (overlaid into Google Earth) from May 20, 2016 shows the location of the hot spots and relative smoke regions across Canada and northern US.



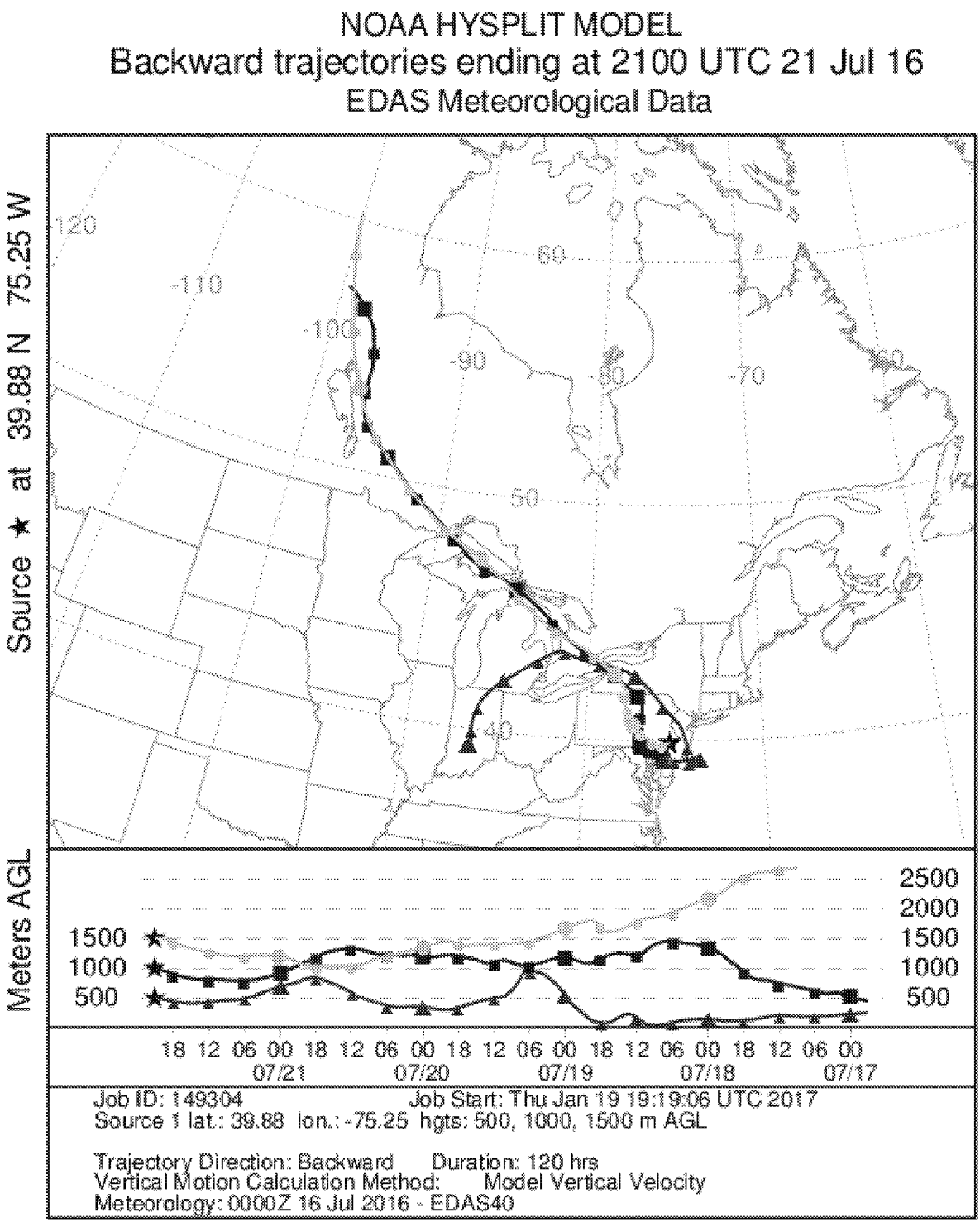
The 120-hour (5-day) back trajectory from May 25, 2016 (below) shows an air mass originating across central Canada, the source region of the fires.



July 21, 2016 - The NOAA fire and smoke detection map below (overlaid into Google Earth) from July 16, 2016 shows the location of the hot spots and relative smoke regions across Canada and northern US.

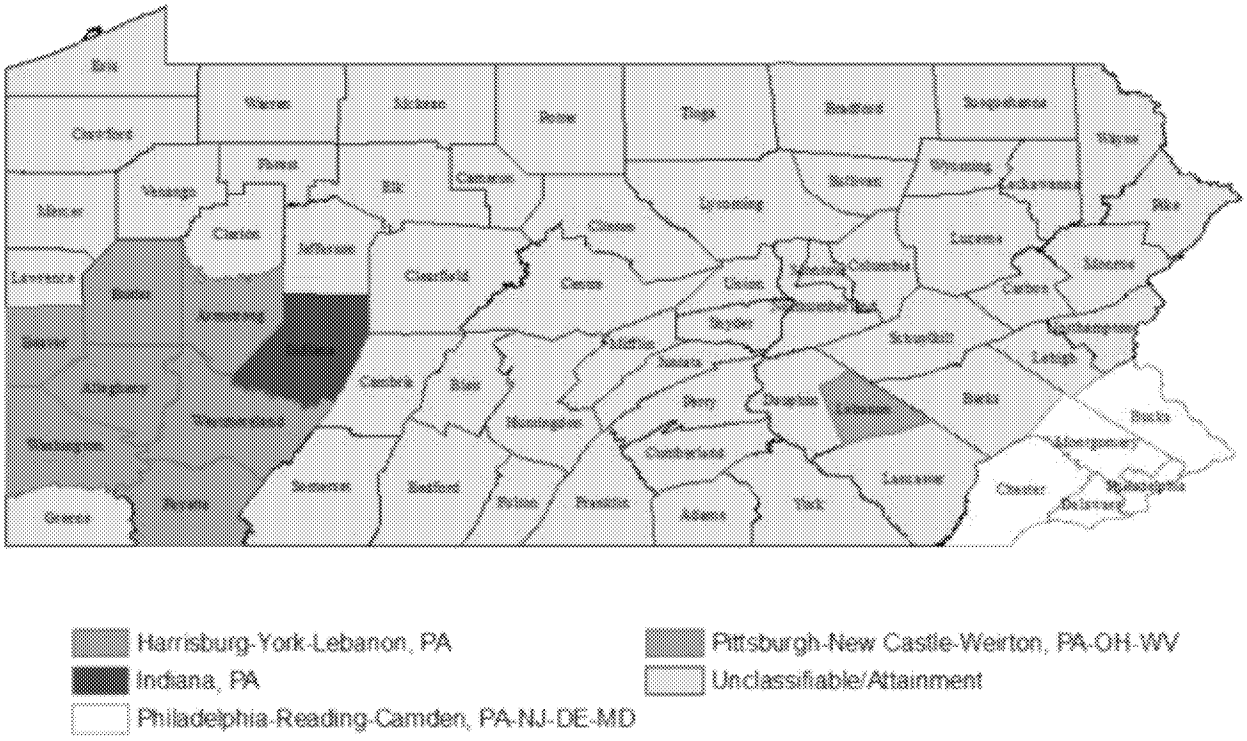


The 120-hour (5-day) back trajectory from July 21, 2016 (below) shows an air mass originating across central Canada, the source region of the fires.



The best way to illustrate the impact of maximum daily 8-hour ozone average concentrations during the four days above had on our ozone monitors' ability to show attainment across the Commonwealth is by providing a table (see attached PDF for details). You will note after reviewing the attached table that flagging this data for exceptional event status will not only impact PADEP's ozone designation recommendations with respect to the 2015 ozone NAAQS but also the current status of attainment (specifically in the Philadelphia nonattainment area) with respect to the 2008 ozone NAAQS.

For quick reference, I have provided the map of our proposed designations below:



As it shows in the attached PDF, approval of the May 25-26, 2016 exceptional event analysis would impact the recommended nonattainment designation for Lebanon County (the Lebanon monitor's 2016 ozone design value would drop from 71 ppb to 70 ppb, therefore being in attainment of the 2015 ozone NAAQS). It would also have an impact on the attainment status for Berks County (the Reading monitor's 2016 ozone design value would drop from 71 ppb to 70 ppb, therefore being in attainment of the 2015 ozone NAAQS).

Approval of the May 25-26, 2016 and July 21-22, 2016 exceptional event analysis would impact the attainment status of the Philadelphia nonattainment area with respect to the 2008 ozone NAAQS. The controlling design values for the Philadelphia nonattainment area are the Bristol monitor (in Bucks County) and the Northeast Airport monitor (in Philadelphia County). Both the Bristol and Northeast Airport 2016 ozone design values would go from 77 ppb to 75 ppb, therefore being in attainment of the 2008 ozone NAAQS.

Keep in mind that the data from these four days are not only likely to impact the 2016 design value period but also the 2017 and 2018 design value period (since the year 2016 is being used in the design value calculation of all three periods).

Finally, I would like to add that we are very concerned with the pace at which the 2016 PM 2.5 speciation data is being added to the AirnowTech (for initial review by the state/local agencies before the data is being sent to EPA's AQS database). As of today, we have the April 2016 data available for our review. At the current pace, the data for both May and July 2016 will come available near the May 31, 2016 submission deadline for these exceptional event analyses. However, that is not enough time to complete an adequate analysis of the data for inclusion in our exceptional event analysis, which is also required to go out for a 30-day public comment period. Having the PM 2.5 speciation data would be very beneficial in our exceptional event demonstrations, since precursors of forest fires show up on the filters.

Thank you for the opportunity to express our viewpoint on both of these periods and why we are planning on pursuing flagging our hourly ozone monitoring data during these two periods in 2016. I will be the point person for this analysis so if you have any preliminary questions, please do not hesitate to ask. My official contact information appears below.

Best regards,

Sean

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